

Modern Slavery Statement

Rothesay is the UK's largest pensions insurance specialist, purpose-built to protect pension schemes and their members' pensions. We are committed to ensuring that the highest professional standards are met at all times.

As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps which Rothesay takes to ensure that slavery and human trafficking is not taking place in any part of our business or in any of our supply chains.

Scope

This statement covers Rothesay Limited and its subsidiaries, Rothesay Life Plc and Rothesay Pensions Management Limited and is applicable from our financial year end, 31 December 2020.

Our business and supply chains

Rothesay is primarily located in and operates from London. Our business model involves core internal operations supported by services provided by a number of trusted third party providers.

Our suppliers

Our key suppliers and business partners provide services in the following areas:

- Technology services
- Pensions administration services
- Middle office operations
- Premises management, such as cleaning and security

We closely monitor the performance of our suppliers through regular meetings with them and on-site reviews. The management of suppliers is overseen by an internal committee, which has stated terms of reference. These terms include the formal review of our critical suppliers at least annually and this process includes a requirement on them to confirm their commitment to ensuring their business is free of slavery. The terms of reference also ensure that new suppliers are fully checked against our onboarding criteria which include the need to have a Modern Slavery Statement where applicable.

We strive to foster long-term relationships with our critical suppliers and we avoid making demands of our suppliers that might lead to them violating human rights.

The supply chains supporting Rothesay are diverse in both category and location. However, we believe that the risk of slavery and human trafficking in our business and supply chains is low. We expect our suppliers to have robust processes to ensure compliance with the Act and to ensure fair employment practices and we work with our closest partners to promote best practice. For example, we require our cleaning suppliers to pay their personnel, who work at our premises, a salary which is equivalent (at least) to the London Living Wage.

Our training

All new employees are educated on the Act and they are made aware of the important role that they play in identifying signs that it may have been breached both within our employee base and within our suppliers. Employees are actively encouraged to report their concerns either internally or via our whistleblowing policy.

Our aim is to raise awareness of the issues and increase informed scrutiny. We are committed to ensuring awareness of the Act across the business as part of our efforts to help eliminate all forms of compulsory labour and human trafficking.

This statement was approved by the Boards of Rothesay Limited and its subsidiaries, Rothesay Life Plc and Rothesay Pensions Management Limited

Signed:

A handwritten signature in black ink, appearing to read 'AM Stoker', is positioned above the printed name of the signatory.

Andrew Stoker, Chief Financial Officer

20 May 2021